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*Attorneys for Defendants*

10 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

11  
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 BRENNA SCHRADER, an individual, on  
behalf of herself and all others similarly  
15 situated,

16 Plaintiff,

17 vs.

18 STEPHEN ALAN WYNN; an individual;  
MAURICE WOODEN, an individual, WYNN  
19 LAS VEGAS, LLC dba WYNN LAS VEGAS  
a Nevada Limited Liability, WYNN  
20 RESORTS, LTD, a Nevada Limited Liability  
Company; and DOES 1-20, inclusive; ROE  
21 CORPORATIONS 1-20, inclusive,

22 Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND  
DEADLINE FOR ALL DEFENDANTS  
TO FILE THEIR REPLIES TO:**

**(1) PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANT WYNN  
LAS VEGAS, LLC'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT,  
DEFENDANT STEPHEN ALAN  
WYNN'S MOTION TO DISMISS, AND  
DEFENDANT MAURICE WOODEN'S  
MOTION FOR A MORE DEFINITE  
STATEMENT (ECF NO. 54); AND**

**(2) PLAINTIFF'S RESPONSE IN  
OPPOSITION TO DEFENDANT WYNN  
RESORTS, LTD.'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT  
(ECF NO. 55)**

**(SECOND REQUEST)**

1 IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”),  
 2 through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC (“WLV”)  
 3 and Wynn Resorts, Ltd. (“WRL”), through their counsel Jackson Lewis P.C., Defendant Stephen  
 4 Alan Wynn (“Mr. Wynn”), through his counsel Peterson Baker, PLLC, and Defendant Maurice  
 5 Wooden (“Mr. Wooden”), by and through his counsel Kennedy & Couvillier, that all Defendants  
 6 shall have a 14-day extension up to and including June 5, 2020, in which to file replies to  
 7 Plaintiffs’ Response in Opposition to Defendant Wynn Las Vegas, LLC’s Motion to Dismiss  
 8 Plaintiff’s Complaint, Defendant Stephen Alan Wynn’s Motion to Dismiss, and Defendant  
 9 Maurice Wooden’s Motion for a More Definite Statement (ECF No. 54); and Plaintiff’s Response  
 10 in Opposition to Defendant Wynn Resorts, Ltd.’s Motion to Dismiss Plaintiff’s Complaint (ECF  
 11 No. 55).

12 This Stipulation is submitted and based upon the following:

13 1. On March 6, 2020, Defendant WLV filed a Motion to Dismiss [ECF No. 35] to  
 14 which Defendant WRL filed a Joinder (ECF No. 37); Defendant WRL filed a Motion to Dismiss  
 15 (ECF No. 36); Mr. Wynn filed a Motion to Dismiss (ECF No. 39); and Mr. Wooden filed a  
 16 Motion for a More Definite Statement (ECF No. 33).

17 2. On April 28, 2020, the parties stipulated that Plaintiff would file her response to  
 18 Defendants’ Motions by May 8, 2020, and Defendants would file their replies by May 22, 2020.  
 19 ECF No. 50. The Court granted the stipulation on April 29, 2020. ECF No. 51.

20 3. Following receipt of Plaintiffs’ responses to the Motions, Defendants determined  
 21 they need additional time to analyze the numerous complex issues raised therein and prepare their  
 22 replies. In addition, counsel for Defendants WRL and WLV require additional time to confer  
 23 with their clients given that the business operations of WRL and WLV are shut down indefinitely  
 24 due to the ongoing COVID-19 pandemic. As such, the parties respectfully request the Court grant  
 25 this instant Stipulation and allow all Defendants an additional 14 days up to and including June 5,  
 26 2020 to file their replies to Plaintiff’s responses.

27 4. This is the second request for an extension of time for Defendants to file their  
 28 replies to Plaintiff’s responses.

1           5.       This request is made in good faith and not for the purpose of delay.

2           6.       Nothing in this Stipulation, nor the fact of entering to the same, shall be construed  
3 as waiving any claim and/or defense held by any party.

4           Dated this 18<sup>th</sup> day of May, 2020.

5           RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

6           /s/ Burke Huber

/s/ Deverie J. Christensen

7           Richard Harris, Bar No. 505

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9           Attorney for Plaintiff

Las Vegas, Nevada 89101

10          Brenna Schrader

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LLC and Wynn Resorts, Ltd.

11          KENNEDY & COUVILLIER

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12          /s/ Maximiliano Couvillier

/s/ Tammy Beatty Peterson

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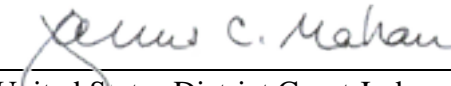
Las Vegas, Nevada 89101

15          Maurice Wooden

Attorney for Defendant  
Stephen Alan Wynn

17                               **ORDER**

18                               IT IS SO ORDERED:

19  
20                                 
21                               United States District Court Judge

22                               Dated:    May 22, 2020  
23                               \_\_\_\_\_